

EPR Issues for Mercury Lamps



Paul Abernathy

Executive Director

Association of Lighting and Mercury Recyclers



Association of Lighting and Mercury Recyclers

Mercury Lighting usage

- 670 million per year discarded nationwide
- About 25% get recycled



Both a CIWMB and DTSC issue

- Projections for 300 million
new CFLs



- Infrastructure for business service is in place and affordable (\$0.20-0.50/bulb all inclusive)



Current situation for public

- Infrastructure for recycling consumer lamps does not exist
- No convenient options for public
- Almost no retail take-back
- 2-4% participation in HHWs
- Direct mail back to recyclers cost prohibitive (\$2-3 per bulb)

Why different approaches may be needed

- **Mercury lamp management is not like other products in many ways.**
 - Volatile toxic material in fragile product



- TSDs are regulated

Differences between lamps and other EPR items

- Value of original product vs. value of recovered materials
- Recycling cost over lamp life cycle is insignificant, but recycling cost relative to new product cost is enough to affect lamp usage.
- Lamps as HW- breaking intentionally is treatment. Recyclers are HW TSDs and operate in highly regulated environment with oversight, compliance costs and CERCLA Liability
- Different commerce and culture for recycling HW vs. products that can either be harvested for reuse, or shredded for shipment offshore. Low entry barriers for handlers.

Where lamps don't fit with EPR

- Retail participation in all cases- including for a fee, and without regard to brand
- Value in recovery and reuse
- Government imposed fee- auto battery, oil, tires, or within EU fee at time of sale

Manufacturer concerns about take-back/financing

- **Manufacturers do not want to “take-back” or to be engaged in the commerce of HW recycling. EU approach has hurt both manufacturers and recyclers.**
- **If manufacturers pay- can cost be put in product-uniformly without state by state intervention or black markets.**
- **How can manufacturers recover costs? Margins and benefits are higher for distributors/retailers.**
- **If retailer sells only one brand, how could they get paid if return program was for all brands?**
- **Liability**

Retailer concerns about take-back

- Breakage in store or parking lot
- Employee training
- Costs, ability to charge a fee to customers (e.g. Staples \$10 for old product return)
- Liability
- Will retailers agree to participate? Will they agree to bear costs?

Funding options to cover recycling costs

- Public funding- Sewer or garbage fees?
- How will local government get assurance they won't have to absorb costs?
- ARF adds bureaucracy into money collection and disbursement.
- Cost for consumers to ship lamps to recyclers one by one is extremely expensive. People will not go to the trouble or spend the money.

Funding options to cover recycling costs

- One manufacturer considering CFL giveaway program where incandescents exchanged for CFL and incandescents will be recycled at their cost.
- One manufacturer considering giving coupon with lamp purchase, that will cover cost of recycling, but packaging and shipping costs are not covered.
- If cost will have to be borne by the lamp user, how to resolve problem of increasing the price until it becomes prohibitive and a disincentive to their use. How real is this concern?

Unsolved issues:

- **The dilemma remains how to make this easy and accessible for homeowners. Convenience for a drop off location is critical.**
- **HHW collection centers' participation is extremely low- about 2%. We don't expect increased CFL use to change that.**
- **Solid waste industry has, so far, not wanted to create diversion programs for their clients.**



Association of Lighting and Mercury Recyclers

Please recycle!



**Do your part to keep
the mercury from
lamps out of the
environment.**